

Barry G. Felder
 Catherine M. McGrath
 THELEN REID BROWN RAYSMAN & STEINER LLP
 875 Third Avenue
 New York, New York 10022
 (212) 603-2000
 Attorneys for Defendants Argyll Biotechnologies, LLC, Argyll Equities, LLC,
 Cuxhaven Holdings, Ltd., Clairsville Holdings, Ltd., James T. Miceli
 and Douglas McClain, Jr.

**UNITED STATES DISTRICT COURT
 SOUTHERN DISTRICT OF NEW YORK**

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LEON S. SEGEN, derivatively on behalf of	:	
IMMUNOSYN CORPORATION,	:	
	:	
Plaintiff,	:	
	:	Civil Action No. 07-11395 (TPG)
-against-	:	
	:	
ARGYLL BIOTECHNOLOGIES, LLC,	:	NOTICE OF MOTION
CUXHAVEN HOLDINGS, LTD,	:	
CLAIRSVILLE HOLDINGS, LTD., ARGYLL	:	
EQUITIES, LLC, DOUGLAS MCCLAIN, JR.,	:	
JAMES T. MICELI, JOHN DOES 1 THROUGH	:	
30 and IMMUNOSYN CORPORATION,	:	
	:	
Defendants.	:	
-----	X	

PLEASE TAKE NOTICE THAT upon the accompanying Memorandum of Law, defendants Cuxhaven Holdings, Ltd., Clairsville Holdings, Ltd., James T. Miceli and Douglas McClain, Jr. will move this Court, before the Honorable Thomas P. Griesa, United States District Judge, at the United States Courthouse, 500 Pearl Street, New York, New York, at a time to be set by the Court, for an order, pursuant to Rule 12(b)(6) of the Federal Rules of Civil Procedure, partially dismissing the complaint for failure to state a claim upon which relief may be granted and for such other and further relief as the Court deems just and proper.

Dated: April 1, 2008

THELEN REID BROWN RAYSMAN
& STEINER LLP

By: s/ Barry G. Felder

Barry G. Felder

Catherine M. McGrath

875 Third Avenue

New York, New York 10022

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